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#### REMARKS

The presently-claimed inventions generally relate to a new and unique system for processing calls arriving from various separate telephones within an automobile or other vehicle. Unlike other telephony systems, our invention provides the user with control over calls received from multiple sources (e.g., a cellular phone, an ONSTAR or similar satellite phone built into the vehicle, cellular phones carried by other passengers, and/or the like).

Because none of the references cited by the Office Action disclose at least this aspect of our inventions, we hereby respond to the Office Action dated August 25, 2005 under 37 C.F.R. §1.111. By this Response, Applicant has cancelled claims 7-8 and 16 without prejudice or disclaimer, amended claims 1, 9 and 10, and has added new dependent claim 21. No new matter is added by these Amendments, and we respectfully request reconsideration of the amended Application.

The Office Action rejected most of our claims (including each of the independent claims) under Section 103, citing the combination of US Patent No. 5,418,836 ("Yazaki") and US Publication 2003/0032460 ("Cannon"). The Office Action further rejected several dependent claims by citing the combination of Yazaki and Cannon as further combined with US Publication 2003/0186686 ("Yang"). Claims Applicant respectfully traverses the rejections because (1) even a combination of the references would fail to anticipate the presently-claimed inventions; and (2) no sufficient bases have been provided for combining the particular references cited in the Office Action.

In particular, none of the cited references discloses at least that *the first call is suspended by placing the first call in a hold queue without terminating the first call, and that the first call is restored from the hold queue in response to a subsequent instruction from the user and is again provided to the user via the at least one audio speaker*. This language essentially appears in each of the amended independent claims, yet this feature is not contemplated in Yazaki, Cannon or Yang. Because no particular reference discloses this feature, even a combination of the three references would fail to anticipate this aspect of our claims.

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In contrast to our claimed inventions, the cited references merely describe simple telephone systems that were never intended to be interlinked in the manner contemplated in our specification and claims. Yazaki, for example, simply describes a mobile phone that has limited integration with the vehicle's audio system. Indeed, the Office Action acknowledges that the Yazaki reference, despite being the primary reference for the rejections, contains no mention of processing calls from a plurality of telephone sources. The other references, however, fail to make up for Yazaki's shortcomings. While the Cannon reference does describe a "hands free" system that works with multiple phones within a vehicle, the described system is not capable of suspending a first call in a hold queue without terminating the call while a second call is using the audio system. To the contrary, Cannon simply describes a system that processes one call at a time, and provides no ability to place calls on "hold" or in a queue. As a result, neither Yazaki or Cannon even remotely relate to the above-referenced language of our claims.

The only reference of record that even remotely relates to call queuing/holding is the Yang reference previously cited against prior claims 4, 6-7 and 16-17. While Yang does allude to "placing a call on hold", the Yang reference is insufficient to support a Section 103 rejection of our claims for several reasons. First, the reference does not relate to placing calls from different telephone sources into a common queue, as recited in at least claim 1. To the contrary, the Yang reference relates to a conventional telephone system, whereby a "base station" controlled by the phone company suspends a data call to a mobile station when a voice call arrives on the telephone network. Stated another way, Yang simply describes "telephone company" functionality that allows a data call to be placed on hold when a voice call is received on the phone network. Both the voice and data calls are established between a common receiver (the "mobile station") and a common sender (the phone network). It does not describe a technique for processing calls received via a plurality of telephone sources (e.g. a cellular phone and a satellite phone) in a common queue.

Moreover, because the Yang reference relates to backend telephone features rather than in-vehicle telephony, Applicant respectfully doubts that a person skilled in the art would be motivated to combine the Yang reference with the cited combination of Yazaki and Cannon. MPEP § 2143.01 sets forth several bases for suggesting a particular combination of references to

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be applied against an applicant's claims. These reasons include the nature of the problem to be solved, the particular teachings of the prior art, and the knowledge of one of ordinary skill in the art. The stated reasons for combining Yazuki and Cannon ("to give priority use to users") and for combining Yang with the Yazuki/Cannon combination ("to handle [an] incoming call to a wireless phone"), however, simply re-state the benefits provided by our invention. Even if the Office Action's statements about the benefits provided by the combination of references are true, these statements fail to apply the proper standard set forth in the MPEP, since "anticipated benefits" is not a basis for the motivation to combine references that is permitted by MPEP 2143.01. The Examiner is therefore respectfully requested to provide additional elaboration as to the suggestion or motivation for combining the references if the Section 103 rejection is maintained.

For the reasons given above, all claims pending in the application are believed allowable and such allowance is respectfully requested. If for some reason Applicant has not requested a sufficient extension and/or has not paid a sufficient fee for this Response and/or for the extension necessary to prevent abandonment on this application, please consider this as a request for an extension for the required time period and/or authorization to charge to GM Deposit Account No. 07-0960 for any fee which may be due.

Respectfully submitted,



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